

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WE SHALL OVERCOME FOUNDATION  
and BUTLER FILMS, LLC, on behalf of  
itself and all others similarly situated,

Plaintiffs,

v.

THE RICHMOND ORGANIZATION, INC.  
(TRO INC.) and LUDLOW MUSIC, INC.,

Defendants.

**C.A. No. 1:16-cv-02725-DLC**

**NOTICE OF MOTION AND PLAINTIFFS' MOTION  
FOR RECONSIDERATION OR REARGUMENT**

TO DEFENDANTS AND THEIR COUNSEL:

TAKE NOTICE THAT, Plaintiffs, We Shall Overcome Foundation (“WSOF”) and Butler Films, LLC (“Butler”), pursuant to Federal Rules of Civil Procedure 59 and 60, and upon the accompanying Memorandum of Law in Support of Plaintiffs’ Motion for Reconsideration of Attorneys’ Fee Award, hereby requests reconsideration or reargument of the Court’s Opinion and Order entered on July 31, 2018 (Doc. 164) (“Fee Award”) awarding an award of attorneys’ fees in the amount of \$352,000 to Plaintiffs as “prevailing parties” under Section 505 of the Copyright Act, 17 U.S.C. § 505.

Dated: August 10, 2018

Respectfully submitted,

WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP

By: \_\_\_\_\_ s/ Mark C. Rifkin  
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